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Attorneys for Plaintiffs Lisa Galaviz and Philip T. Prince

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

**In re ORACLE CORPORATION
DERIVATIVE LITIGATION**

Master File No. C-10-03392-RS

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
FILING AMENDED CONSOLIDATED
SHAREHOLDER COMPLAINT**

Judge: Hon. Richard Seeborg
Ctrm: 3 17th Floor



1 WHEREAS, on November 9, 2011, this Court granted the Motion to Dismiss filed by
 2 nominal defendant Oracle Corporation (“Oracle”) and individual defendants Jeffrey S. Berg, H.
 3 Raymond Bingham, Michael J. Boskin, Safra Catz, Lawrence J. Ellison, Hector Garcia-Molina,
 4 Jeffrey O. Henley, Donald L. Lucas, Charles L. Phillips, Charles L. Phillips, Jr., and Naomi O.
 5 Seligman (“Individual Defendants,” and together with Oracle “Defendants”), with leave to
 6 amend, and further ordered that (1) Plaintiffs Lisa Galaviz and Philip T. Prince (“Plaintiffs”)
 7 shall file any amended complaint within thirty days of the order or by December 9, 2011 and (2)
 8 setting a status conference for January 26, 2012; and

9 WHEREAS, on November 10, 2011, the Superior Court for the State of California,
 10 County of San Mateo, granted the Petition for Writ of Mandate for Inspection of Corporate
 11 Books and Records filed by Plaintiffs (the “Petition”); and

12 WHEREAS, a stipulation has been submitted to the Superior Court for the State of
 13 California, County of San Mateo, wherein the parties agreed, subject to approval, to extend the
 14 deadline for Oracle’s Compliance with the San Mateo Court’s order on Plaintiffs’ Petition; and

15 WHEREAS, the agreed-upon schedule promotes judicial efficiency, and will not cause
 16 prejudice to any party or unnecessary delay; and

17 THEREFORE, IT IS STIPULATED AND AGREED by Plaintiffs and Defendants,
 18 through their respective counsel of record, as follows, subject to the approval of this Court:

19 Plaintiffs shall file the Amended Consolidated Shareholder Complaint by February 10,
 20 2012. Plaintiffs reserve the right to request additional time for filing based on Oracle’s
 21 compliance with the San Mateo Court’s Order.

22 The parties shall appear at the status conference on January 26, 2012 as scheduled.

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 24 IT IS SO STIPULATED.

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1 Dated: December 1, 2011

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15
16 *Attorneys for Plaintiffs Lisa Galaviz and Philip T.*
17 *Prince, derivatively on behalf of Oracle*
18 *Corporation*

19
20 **JERRY K. CIMMET**
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24 /s/
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1 I, Jordanna G. Thigpen, am the ECF user whose ID and password is being used to file this
2
3 **STIPULATION TO EXTEND TIME FOR FILING AMENDED CONSOLIDATED**
4
5 **SHAREHOLDER COMPLAINT.** In compliance with General Order 45, X, B, I hereby attest
6 that Jerry K. Cimmet has concurred with this filing.
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8

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STIPULATION TO EXTEND TIME FOR FILING AMENDED CONSOLIDATED
SHAREHOLDER COMPLAINT. In compliance with General Order 45, X, B, I hereby attest
that John M. Kelson has concurred with this filing.

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Donald L. Lucas, Charles L. Phillips, Charles L.
Phillips, Jr., Naomi O. Seligman, and Oracle
Corporation*

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25 **STIPULATION TO EXTEND TIME FOR FILING AMENDED CONSOLIDATED**
26 **SHAREHOLDER COMPLAINT.** In compliance with General Order 45, X, B, I hereby attest
27 that Philip T. Besirof has concurred with this filing.



1 IT IS SO ORDERED.
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3 Dated: 12/1/11 _____
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By:



HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE